

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	Case No. 22-60043
	§	
FREE SPEECH SYSTEMS, LLC,	§	Chapter 11 (Subchapter V)
	§	
Debtor.	§	

**NOTICE OF FILING OF
ORDER GRANTING EMERGENCY MOTIONS FOR REMAND**

PLEASE TAKE NOTICE that David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi, Carlos M. Soto, Jillian Soto-Marino, William Aldenberg, William Sherlach, and Robert Parker (collectively, Connecticut Plaintiffs) filed, on August 3, 2022, in Adv. Pro. Nos. 22-05019, 22-05020, and 22-05021 in the United States Bankruptcy Court for the District of Connecticut (the Connecticut Adversary Proceedings), their *Emergency Motions for Remand* (the Motions for Remand) in response to Free Speech Systems, LLC (FSS) filing its *Notices of Removal* initiating each of the three Connecticut Adversary Proceedings. Objections were filed to the Motions for Remand, and an expedited hearing was held on August 12, 2022. The Court entered the *Order Granting Emergency Motions for Remand* on August 15, 2022 in each of the Connecticut Adversary Proceedings (the Order Granting Remand). A true and correct copy of the Order Granting Remand is attached hereto as **Exhibit A**.

The Connecticut Plaintiffs file this Notice to:

- (i) provide the Court with a courtesy copy of the Order Granting Remand;
- (ii) respectfully inform the Court that the Order Granting Remand specifically notes that: “remand will not have a negative effect on the administration of

FSS's bankruptcy estate;" "the Connecticut Superior Court agreed that jury selection and the trial could not proceed against FSS due to the automatic stay it received when it filed its Chapter 11 case on July 29, 2022;" and "(i)f remand does not occur, the prejudice to the Plaintiffs is much greater than any possible prejudice to FSS;" and

- (iii) respectfully inform the Court that the undersigned counsel will attempt to confer with Debtor's counsel to reach an agreement to lift the automatic stay as to the Debtor so it may have the opportunity to participate in the underlying litigation.

Respectfully submitted this 16th day of August 2022.

/s/ Ryan E. Chapple

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**ATTORNEYS FOR
CONNECTICUT PLAINTIFFS**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice of Filing has been served on counsel for Debtor, Debtor, and all parties receiving or entitled to notice through CM/ECF on this 16th day of August 2022.

/s/ Ryan E. Chapple
Ryan E. Chapple